

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

**TREVOR FITZGIBBON,**

**PLAINTIFF**

**vs.**

**JESSELYN A. RADACK,**

**DEFENDANT**

**Civil Action No. 3:19-cv-477-REP**

**MOTION FOR EXTENSION OF TIME**

Defendant, Jesselyn A. Radack (“Radack”), by counsel, pursuant to Fed. R. Civ. P. 6(b)(1) and Local Rule 7(F)(2)(b), files this motion for an extension of time to and including October 23, 2019, within which to file her Answer to the Amended Complaint filed by Plaintiff, and states as follows:

1. Counsel for Defendant continues to review the allegations raised in the Amended Complaint with Defendant and requires additional time to respond to the same.
2. No party would be prejudiced by the extension. Defendant has filed a Motion to Dismiss the Amended Complaint which is currently pending.
3. The time to respond has not expired.
4. Undersigned counsel was unable to reach opposing counsel to obtain his position on this Motion.
5. A proposed order is attached hereto.

WHEREFORE, Defendant, Jesselyn A. Radack requests that this Motion for Extension of Time be granted, and that Radack be permitted to file her Answer to Plaintiff's Amended Complaint on or before October 23, 2019, and that the Court enter the proposed Order attached hereto, and for such other and further relief as this Court deems appropriate and just.

Dated: October 15, 2019

Respectfully submitted,

/s/ D. Margeaux Thomas  
D. Margeaux Thomas (VSB #75582)  
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*Counsel for Defendant Jesselyn A. Radack*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 15, 2019, a copy of the foregoing document was filed with the Court electronically. Notice of this filing will be sent automatically by the Court's CM/ECF system to the following parties:

Steven S. Biss  
300 West Main Street, Suite 102  
Charlottesville, VA 22903  
*Counsel for Plaintiff*

/s/ D. Margeaux Thomas  
D. Margeaux Thomas (VSB #75582)